

### **Guidance for Free Clinic Pharmacy Applicants**

Free clinics applying for a pharmacy permit which do not have a need for a full service pharmacy should apply for a special or limited-use permit as described in section 18 VAC 10-20-120 (1) and (2) on page 5 of "Regulatory Information for New Pharmacies" and submit the required information with the application and fee. While waivers are granted by the Board on an individual case basis after considering the merit of each such request, the Board will normally waive certain provisions of regulations for free clinic pharmacies as follows:

#### **18 VAC 110-20-110 (A) Pharmacist-In-Charge (PIC)**

- the prohibition against a pharmacist serving as PIC of more than one pharmacy simultaneously provided there is no other pharmacist able to be PIC, the hours of the free clinic are very limited, and the Board determines that the quality of pharmacy practice will not be compromised by this waiver.

#### **18 VAC 110-20-150-Physical Standards**

- the size requirement of 240 square feet provided there is adequate room inside the enclosure for both storage of drug inventory, equipment, and records and for working space.
- the sink being inside the pharmacy provided there is a sink with hot and cold running water in close proximity which is not a bathroom sink.
- this section already provides that a refrigerator is not required if the pharmacy does not stock drugs requiring cold storage.

#### **18 VAC 110-20-170-Minimum Equipment**

- prescription balances provided no compounding is to be done at the clinic pharmacy.

The Board typically requires that the provisions of 18 VAC 110-20-180 concerning the burglar alarm system and 18 VAC 110-20-190 concerning enclosures be met. A free clinic pharmacy may request a waiver of 18 VAC 110-20-190 (C) for the purpose of securing a drug order in the pharmacy if it is absolutely necessary that drugs be delivered in the absence of a pharmacist or for the purpose of repairing or upgrading essential pharmacy equipment when those repairs or upgrades cannot be reasonably performed while a pharmacist is present. A request for this waiver will be very closely scrutinized and granted at the discretion of the Board, if deemed necessary and appropriate, and only then under specific terms.